



REGION 3: THE MID-ATLANTIC STATES

SERVING THE DISTRICT OF COLUMBIA, DELAWARE, MARYLAND, PENNSYLVANIA, VIRGINIA AND WEST VIRGINIA
Environmental Science Center
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DATE:	June 8, 2011
SUBJECT:	START IV Program QAPP [DCN 110061]
FROM:	Michael H. Mahoney, Chemist OASQA/QAT (3EA22)
THROUGH:	Fred Foreman, Chief, Technical Services Branch OASQA (3EA22)
TO:	Gregory Ham Project Officer HSCD (3HS31)

A START contract QAPP prepared by TECHLAW was reviewed against the appropriate guidance documents.¹ Recommendations for additional discussion and clarification have been provided for your review. This document is not designed to be a stand-alone document, nor can it be used without incorporating substantial site specific information. The document was reviewed with a slant toward its intended purpose so the document should be modified as outlined below:

[Section A, Page 4 of 20] The document explains that the Field Team Leader, as a START contractor, has the authority to modify in the field and approve changes to the SAP/QAPP. This statement is incorrect. The only person, who can approve the QAPP / SAP /FSP or changes to those documents, or modify those documents in the field, is the EPA Project Manager. It is not possible to delegate that authority to a non-government entity. START input to the situation and possible resolutions is welcome and expected, but the authority to go forward with any change to the SAP, rests with the EPA.

There is a nomenclature issue with this document. According to this document, the QAPP portion will be used as a template and a site specific SAP will be added to complete the site documentation. However, a SAP is defined² as a combination of a QAPP and a Field Sampling

¹ The review was based on guidance provided in " Guidance on Systematic Planning using the Data Quality Objectives Process (QA/G-4) [EPA/240/B-06/001 February 2006](#), "EPA Requirements for Quality Assurance Project Plans" (QA/G5) [EPA/240/R-02/009 December 2002](#), "Guidance on Environmental Data Verification and Data Validation", Re-issued January 2008 (EPA QA/G-8), "Contract Laboratory Program National Functional Guidelines for Organic Data Review", EPA 540/R-99/008 (USEPA, 1999), "Contract Laboratory Program National Functional Guidelines for Inorganic Data Review", EPA 540/R-034/004 (USEPA, 2004c), "Guidance for Data Quality Assessment: Practical Methods for Data Analysis" (QA/G9, [EPA/240/B-06/003 February 2006](#), "Region III Modifications to the Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analysis," April 1993, and "Region III Modifications to National Functional Guidelines for Organic Data Review Multi-media, Multi-concentration (OLMO1.0-OLMO1.9) September 1994.

² CFR 300.420 (iii) (4)

Plan (FSP). Wherever the term SAP is used in this document, it should be changed to FSP. Since the subject document is being used as a template, the document is recommended for approval when these changes are made as outlined.

If you have any questions or comments, please call Michael Mahoney at (410) 305-2631.